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Aaron Halegua
AARON HALEGUA, PLLC
524 Broadway, 11th Floor
New York, New York 10012
Tel: (646) 854-9061
Email: ah@aaronhalegua.com

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

TIANMING WANG, *et. al*,

Plaintiffs,

v.

GOLD MANTIS CONSTRUCTION
DECORATION (CNMI), LLC, *et. al*,

Defendants.

Case No. 18-cv-0030

**DECLARATION OF BRUCE
BERLINE IN SUPPORT OF
PLAINTIFFS' THIRD PETITION FOR
ATTORNEYS' FEES AGAINST
THIRD-PARTY WITNESS LIJIE CUI**

Hearing Date: n/a
Hearing Time: n/a
Judge: Hon. Ramona V. Manglona

I, BRUCE BERLINE, hereby state and declare the following:

1. I am over eighteen years of age and am fully competent to testify to the facts set forth in this declaration. I, along with Aaron Halegua, represent Plaintiffs in this action.

2. I submit this declaration in support of Plaintiffs' third petition for attorneys' fees and costs against third-party witness Lijie Cui ("Ms. Cui"). On November 5, 2021, the Court found Ms. Cui in

1 contempt (again) for failing to comply with the Preservation Order and subsequent related orders that
2 required her to produce all ESI backups, produce login credentials for her iTunes and/or iCloud
3 accounts containing those backups, and file a sworn statement addressing these subjects. (ECF No.
4 447 (“November 5 Contempt Order)).¹ As one of the sanctions for this contempt, the Court awarded
5 attorney’ fees and costs to Plaintiffs. (*Id.*).

6 3. The declaration submitted by my co-counsel, Aaron Halegua, sets forth the background of the
7 Preservation Order, the August 25 Contempt Order (ECF No. 411), the October 6, 2021 status
8 conference, and the evidentiary hearing that took place.

9 4. I note that Plaintiffs have submitted numerous prior fee petitions in this matter (ECF Nos. 62,
10 110, 133, 226) and I have submitted several declarations accompanying each of those petitions (ECF
11 Nos. 64, 76, 112, 133-2, 228 (“Prior Berline Declarations”)).

12 5. Since Mr. Halegua became involved in this case, he and I have coordinated our work closely
13 to maximize our efficiency and to avoid, as much as possible, duplicating work. For the work that
14 forms the basis for this petition for attorneys’ fees, Mr. Halegua was primarily responsible for all
15 matters. I participated in discussions with Mr. Halegua on strategy questions and the conduct of the
16 evidentiary hearing, performed legal research on discreet questions, reviewed outlines and various
17 filings, and attended all Court hearings.

18 6. As discussed in the Prior Berline Declarations, I make contemporaneous records of the tasks
19 that I perform, the date on which I perform them, and the amount of time that I spend on each task. I
20 also note that my time entries likely understate the actual number of hours that I have worked on this
21 case since Mr. Halegua and I often have conversations late in the Saipan evening, when I am not in
22 my office, that do not get recorded onto my time sheet. The time entries for which I am seeking fees
23 in connection with this petition are presented in **Appendix A** below. (Entries for travel time were
24 reduced by 50%, as can be seen in my time records).

¹ The defined terms used in this declaration and throughout Plaintiffs’ fee petition have the same meaning as in Plaintiffs’ response to the Order to Show Cause (ECF No. 400), unless otherwise noted.

1 7. Like Mr. Halegua, I eliminated from my time sheet any entries for tasks that were solely or
2 predominately related to the issue of Ms. Cui's rose-gold cell phone, such as tasks related to
3 preparation of Corrado Modica's testimony. I eliminated 4.20 hours on this basis.

4 8. For the remaining 28.29 hours of work, it is difficult to precisely separate the time spent on the
5 phone issue versus the other issues for which Ms. Cui was held in contempt. Accordingly, having
6 already eliminated the 4.20 hours for the purely phone-related time entries, consistent with the
7 reasoning set forth in Mr. Halegua's declaration, I then applied a 40% reduction to the remaining hours.
8 Therefore, I am seeking a total of 16.97 hours for my work related to this fee petition.

9 9. My administrative assistant, Luvisminda S. Ramos, performed approximately 28.65 hours of
10 work in connection with the evidentiary hearing. Particularly as Mr. Berline was in quarantine, Ms.
11 Ramos was present in the courtroom each day to ensure Plaintiffs' witnesses were present and to
12 distribute hard copies of Plaintiffs' exhibits, when necessary. In an exercise of billing discretion,
13 Plaintiffs are not seeking fees for this time.

14 10. My office paid for various costs incurred in relation to enforcing the Preservation Order and
15 ultimately finding Ms. Cui in contempt. I am seeking reimbursement for \$2,873.20 of those costs.
16 **Appendix B** is a table listing these costs and **Appendix C** contains copies of some of these invoices.
17 The costs include the service of witness subpoenas and the payment of witness fees to Juan Lizama
18 and Fely P. Forbes. I am not seeking reimbursement of those costs paid for Corrado Modica. I also
19 paid Mike Yang, a Mandarin interpreter, to be present at the evidentiary hearing because Plaintiffs
20 called Ms. Cui to testify and needed him to serve as a check-interpreter for the Chinese-speaking
21 witnesses called by Ms. Cui testified. The other costs are for PACER charges as well as printing and
22 photocopying costs in the preparation of exhibits for the evidentiary hearing.

23 11. TransPerfect also issued two invoices to Plaintiffs related to this matter. The first concerned
24 tasks related to Ms. Cui's cell phone and I have sought reimbursement of these costs through both
Plaintiffs' prior fee petition (ECF No. 423) as well as Plaintiffs' Motion for an Order to Show Cause
(ECF No. 451). The second invoice concerns tasks related to Ms. Cui's computer, iTunes and iCloud
passwords (that did not work), preparing a related summary report, and Mr. Langton's testimony at

1 the evidentiary hearing that Ms. Cui's phone was wiped clean in March 2021 and a backup was
2 restored onto the phone via iTunes. The second invoice is for \$8,288.10. After exchanging numerous
3 emails and multiple videoconferences with Ms. Cui's counsel, she agreed to pay these costs, except
4 for the \$1,112.50 charge for a line item for 2.50 hours spent on "Standby & Testimony." Plaintiffs
5 therefore seek reimbursement of this expense from Ms. Cui. **Appendix D** is a copy of TransPerfect's
6 second invoice upon which Ms. Cui's counsel highlighted the portions that she has agreed to pay (in
7 yellow) and that portion to which she objects (in pink).

8 I declare under penalty of perjury that the foregoing is true and correct. Executed in Saipan,
9 CNMI on this 28th day of November, 2021.

10
11 _____/s/_____
Bruce Berline

Appendix A
Time Sheet

Date	Task	Hours
10/6/21	Attend status conference via vtc 8:45 a.m. - 9:55 a.m.	1.50
10/13/21	Teleconference with Aaron on witness preparation, 5th amendment research.	0.15
10/14/21	Review Aaron's outline of evidence for contempt hearing.	0.40
10/14/21	Teleconference with Aaron on witnesses, evidence, 5th Amendment inferences.	0.82
10/14/21	Review various e-mails from Aaron and Clyde regarding witness lists and exhibits for evidentiary hearing.	0.10
10/15/21	Preparation for hearing in morning; review Aaron's updated outline for hearing; review and respond to various e-mails from Aaron regarding issues for hearing.	2.40
10/15/21	Teleconference with Aaron on witness preparation.	0.25
10/15/21	Attend Evidentiary Hearing 9:35 a.m.-12:05 pm; 1:10 p.m. - 1:55 p.m.	4.50
10/17/21	Continue researching issue of Cui taking fifth amendment and consequences (adverse inferences); find examples of adverse inferences drawn by courts.	2.50
10/18/21	Research on admission of deposition testimony; relation to taking 5A, unavailability of witness.	1.50
10/18/21	Attend Evidentiary Hearing 1:35 p.m.-3:05 p.m.; 4:00 p.m.- 5:00 p.m.	3.50
10/18/21	Cui evidentiary preparation teleconference with Aaron re hearing, including Lizama cross/redirect, Chi's refusal to be deposed, contempt sanctions.	0.72
10/19/21	Attend Evidentiary Hearing 8:30 a.m.- 8:45 a.m.; 9:05 a.m.-10:45 a.m.; 11:05 a.m.- 12:05 p.m.; 12:20 p.m.-1:00 p.m.	4.50
10/19/21	Teleconference with Aaron regarding hearing (.5); review power point slides and compare with notes (.5).	1.00
10/19/21	Review Aaron's second draft of powerpoint presentation and make comment (.3); review and reply to various e-mails from Aaron (.2).	0.50
10/19/21	Review initial time line powerpoint slide from Aaron.	0.10
10/20/21	Teleconference with Aaron regarding closing.	0.40
10/20/21	Attend Evidentiary Hearing Closing 8:30 a.m. - 10:15 a.m.	1.80
10/20/21	Teleconference with Aaron regarding evidentiary hearing; review various e-mails from Aaron regarding additional cases regarding evasive answers; and e-mail to and from Clyde Lemons regarding stipulation to additional evidence.	0.30
11/5/21	Teleconference with Aaron regarding upcoming Cui status conference, possible sanctions, Clyde Lemons withdrawal.	0.20
11/5/21	Travel to and from US District Court for Status Conference (0.8).	0.40
11/5/21	Attend status conference 8:30 a.m. - 9:15 a.m.	0.75
Total:		28.29

Appendix B*Litigation Costs*

Witness Fees		
10/07/2021	Subpoena witness fee Rule 45 Juan Lizama	\$45.00
10/15/2021	Subpoena witness fee Rule 45 Fely P. Forbes	\$45.00
10/18/2021	Subpoena witness fee Rule 45 Fely P. Forbes	\$45.00
10/19/2021	Subpoena witness fee Rule 45 Fely P. Forbes	\$45.00
Service of Process		
10/07/2021	Service Process Subpoena for Juan T. Lizama	\$45.00
10/15/2021	Service Process Subpoena for Fely P. Forbes	\$45.00
10/18/2021	Service Process Subpoena for Fely P. Forbes	\$45.00
10/19/2021	Service Process Subpoena for Fely P. Forbes	\$45.00
Translation Services		
10/20/21	Mike Yang Translation service 10/15/2021-10/19/2021	\$734.50
Printing and Copies		
	Office copies/printing charges (2400 at \$0.25/page)	\$600.00
PACER Charges		
	Pacer Q3 billing 09/13/2021-09/30/2021 (446 pages).	\$44.60
	Pacer Q4 billing 10/01/2021-10/20/2021 (216 pages).	\$21.60
TransPerfect		
10/27/21	TransPerfect Invoice 056660COMB – outstanding charge	\$1,112.50
	Total:	\$2,873.20

Appendix C

Litigation Cost Invoices

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AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action

UNITED STATES DISTRICT COURT

for the

Tianming Wang, et al.

Plaintiff

v.

Gold Mantis, et al.

Defendant

Civil Action No. 18-cv-0030

SUBPOENA TO APPEAR AND TESTIFY
AT A HEARING OR TRIAL IN A CIVIL ACTION

To: Juan T. Lizama

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. District Court

Courtroom No.: 3rd Floor

Date and Time: October 15, 2021, 9:30 a.m.

You must also bring with you the following documents, electronically stored information, or objects *(leave blank if not applicable)*:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/7/2021

CLERK OF COURT

OR

Aaron Halegua

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Tianming Wang, et al. _____, who issues or requests this subpoena, are:

Aaron Halegua, 524 Broadway, 11th Floor, New York, NY, 10012, ah@aaronhalegua.com, 646-854-9061.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action (page 2)

Civil Action No. 18-cv-0030

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for (name of individual and title, if any)

JUAN T. LIZAMA

on (date)

☒ I served the subpoena by delivering a copy to the named person as follows:JUAN T. LIZAMALIZAMA'S LAW OFFICE10-8-2021 @ 5:15 PM

on (date)

; or

☐ I returned the subpoena unexecuted because:

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$

My fees are \$

for travel and \$

for services, for a total of \$

45.00

I declare under penalty of perjury that this information is true.

Date:

10-8-2021

Server's signature

Printed name and title

PO BOX 502390, CAMDEN NJ 08105

Server's address

Additional information regarding attempted service, etc.:

2054

LAW OFFICE OF BRUCE BERLINE LLCPO BOX 5682 CHRB
SAIPAN, MP 96950
TELEPHONE NO. (670) 233-3663FIRST HAWAIIAN BANK
GUALO RAI BRANCH
SAIPAN, MP 96950

59-306/1214

10/7/2021

PAY TO THE
ORDER OF Juan T. Lizama

\$ **45.00

Forty-Five and 00/100***** DOLLARS

Juan T. Lizama

MEMO

Witness Fee



AUTHORIZED SIGNATURE

MP

⑈002054⑈ ⑆121403065⑆ 17⑈069306⑈

Security features included. Details on back.

LAW OFFICE OF BRUCE BERLINE LLC

Juan T. Lizama

Witness Fee

10/7/2021

45.00

2054

General Account

Witness Fee

45.00

LAW OFFICE OF BRUCE BERLINE LLC

Juan T. Lizama

Witness Fee

10/7/2021

45.00

2054

PAYMENT
RECORD

General Account

Witness Fee

45.00

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of the Northern Mariana Islands

RECEIVED

Tianming Wang, et al.

Plaintiff

v.

Gold Mantis, et al.

Defendant

Civil Action No. 18-cv-0030

Fely Forbes
10/13/2021**SUBPOENA TO APPEAR AND TESTIFY
AT A HEARING OR TRIAL IN A CIVIL ACTION**

To: Fely P. Forbes

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. District Court

Courtroom No.: 3rd Floor

Date and Time: 10/15/2021 9:30 am

You must also bring with you the following documents, electronically stored information, or objects (leave blank if not applicable):

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/13/2021

CLERK OF COURT

OR

Aaron Halegua

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Tianming Wang, et al., who issues or requests this subpoena, are:

Aaron Halegua, 524 Broadway, 11th Floor, New York, NY, 10012, ah@aaronhalegua.com, 646-854-9061.

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AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action (page 2)

Civil Action No. 18-cv-0030

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

~~I received this subpoena for (name of individual and title, if any)~~ FELY P. FORMER
 on (date) 10/13/2021

☒ I served the subpoena by delivering a copy to the named person as follows: FELY P. FORMER
IT'S OFFICE, MIDDLE ROAD, SHIPAN, MP 96450 @ 1:30 PM
 on (date) 10.13.21; or

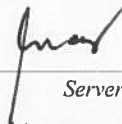
☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ \$ 45.00.

I declare under penalty of perjury that this information is true.

Date: _____



Server's signature

Luis Antonio S. Panes

Printed name and title

PO BOX 502891, NEWPORT, SHIPAN MP 96450

Server's address

Additional information regarding attempted service, etc.: _____

1804

LAW OFFICE OF BRUCE BERLINE LLC

TRUST ACCOUNT
PO BOX 5682 CHRB
SAIPAN, MP 96950
TELEPHONE NO. (670) 233-3663

FIRST HAWAIIAN BANK
GUALO RAI BRANCH
SAIPAN, MP 96950

59-306/1214

10/13/2021

PAY TO THE
ORDER OF Fely Forbes

\$ ****45.00**

Forty-Five and 00/100*****
DOLLARS

Fely Forbes

MEMO

Witness fee



[Signature]
AUTHORIZED SIGNATURE

MP

⑈001804⑈ ⑆121403065⑆ 17⑈067524⑈

LAW OFFICE OF BRUCE BERLINE LLC

1804

Fely Forbes

10/13/2021

Witness fee

45.00

RECEIVED
Fely Forbes
10/13/2021

Checking - Client Trus Witness fee

45.00

LAW OFFICE OF BRUCE BERLINE LLC

1804

Fely Forbes

10/13/2021

Witness fee

45.00

PAYMENT
RECORD

Checking - Client Trus Witness fee

45.00

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of the Northern Mariana Islands

Tianming Wang, et al.

Plaintiff

v.

Gold Mantis, et al.

Defendant

Civil Action No. 18-cv-0030

Fely Forbes
10/15/2021SUBPOENA TO APPEAR AND TESTIFY
AT A HEARING OR TRIAL IN A CIVIL ACTION

To: Fely P. Forbes

(Name of person to whom this subpoena is directed)

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Place: U.S. District Court

Courtroom No.: 3rd Floor

Date and Time: 10/18/2021 1:30 pm

You must also bring with you the following documents, electronically stored information, or objects (leave blank if not applicable):

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/15/2021

CLERK OF COURT

OR

Aaron Halegua

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Tianming Wang, et al, who issues or requests this subpoena, are:

Aaron Halegua, 524 Broadway, 11th Floor, New York, NY, 10012, ah@aaronhalegua.com, 646-854-9061.

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AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action (page 2)

Civil Action No. 18-cv-0030

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*I received this subpoena for (name of individual and title, if any) FELY P. FORNERon (date) 10.15.2021☒ I served the subpoena by delivering a copy to the named person as follows: FELY P. FORNER@ SUSUPA, 3:35 PMon (date) 10.15.2021; or☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 45.00

I declare under penalty of perjury that this information is true.

Date: 10.15.2021

Server's signature

Luis Antonio O. Ramel - Admin. Asst.

Printed name and title

PO. BOX 502390, SAIPAN, MP 96900

Server's address

Additional information regarding attempted service, etc.: _____

LAW OFFICE OF BRUCE BERLINE LLC

TRUST ACCOUNT
PO BOX 5682 CHRB
SAIPAN, MP 96950
TELEPHONE NO. (670) 233-3663

FIRST HAWAIIAN BANK
GUALO RAI BRANCH
SAIPAN, MP 96950

59-306/1214

1805

10/18/2021

PAY TO THE
ORDER OF Fely Forbes

\$ **45.00

Forty-Five and 00/100***** DOLLARS

Fely Forbes

MEMO

Witness fee hearing 10/18/2021



[Signature]
AUTHORIZED SIGNATURE

MP

⑈001805⑈ ⑆121403065⑆ 17⑈067524⑈

LAW OFFICE OF BRUCE BERLINE LLC

1805

Fely Forbes

10/18/2021

Witness fee hearing 10/18/2021

45.00

RECEIVED

[Signature]
Fely Forbes
10/18/2021

Checking - Client Trus Witness fee hearing 10/18/2021

45.00

LAW OFFICE OF BRUCE BERLINE LLC

1805

Fely Forbes

10/18/2021

Witness fee hearing 10/18/2021

45.00

PAYMENT
RECORD

Checking - Client Trus Witness fee hearing 10/18/2021

45.00

RECEIVED

10/18/2021

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of the Northern Mariana Islands

Tianming Wang, et al.

Plaintiff

v.

Gold Mantis, et al.

Defendant

Civil Action No. 18-cv-0030

**SUBPOENA TO APPEAR AND TESTIFY
AT A HEARING OR TRIAL IN A CIVIL ACTION**

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(Name of person to whom this subpoena is directed)

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Place: U.S. District Court

Courtroom No.: 3rd Floor

Date and Time: 10/19/2021 8:30 am

You must also bring with you the following documents, electronically stored information, or objects (leave blank if not applicable):

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Date: 10/18/2021

CLERK OF COURT

OR

Aaron Halebua

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Tianming Wang, et al

, who issues or requests this subpoena, are:

Aaron Halebua, 524 Broadway, 11th Floor, New York, NY, 10012, ah@aaronhalebua.com, 646-854-9061.

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AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action (page 2)

Civil Action No. 18-cv-0030

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for (name of individual and title, if any)

FELY P. FORBES

on (date)

10.18.2021☒ I served the subpoena by delivering a copy to the named person as follows:FELY P. FORBES@ SURE

on (date)

10.18.2021

; or

6:36 PM.☐ I returned the subpoena unexecuted because:

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____

for travel and \$ _____

for services, for a total of \$ _____

0.00

I declare under penalty of perjury that this information is true.

Date:

10.18.2021

Server's signature

LWISIANA S. RAMOS - ADMIN. ASST.

Printed name and title

PO BOX 502390 HAWAII ST. (ATP), MP 96950

Server's address

Additional information regarding attempted service, etc.:

LAW OFFICE OF BRUCE BERLINE LLC

TRUST ACCOUNT
PO BOX 5682 CHRB
SAIPAN, MP 96950
TELEPHONE NO. (670) 233-3663

FIRST HAWAIIAN BANK
GUALO RAI BRANCH
SAIPAN, MP 96950

59-306/1214

10/18/2021

PAY TO THE
ORDER OF Fely Forbes

\$ ****45.00**

Forty-Five and 00/100***** DOLLARS

Fely Forbes

MEMO

Witness fee hearing 10/19/2021



[Signature]
AUTHORIZED SIGNATURE

MP

⑈001806⑈ ⑆121403065⑆ 17⑈067524⑈

LAW OFFICE OF BRUCE BERLINE LLC

1806

Fely Forbes

10/18/2021

Witness fee hearing 10/19/2021

45.00

RECEIVED

[Signature] Fely Forbes
10/18/2021

Checking - Client Trus Witness fee hearing 10/19/2021

45.00

LAW OFFICE OF BRUCE BERLINE LLC

1806

Fely Forbes

10/18/2021

Witness fee hearing 10/19/2021

45.00

PAYMENT
RECORD

Checking - Client Trus Witness fee hearing 10/19/2021

45.00

Hua Yang (Mike Yang)

P.O. Box 503754
Saipan, MP 96950-3754
Tel. No. (670) 483-8845

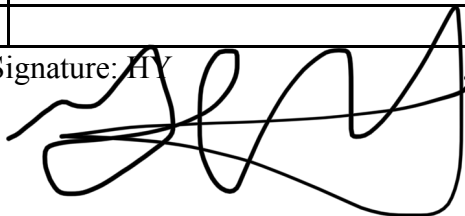
TO: Law Office of Bruce Berline LLC

Below is the detailed bill for Chinese translation service performed by Mike yang (Hua Yang in the NMI, U.S. Distict Court Case of Wang Case Evidentiary Hearing from 10/15/2021-10/19/2021 18-CV-00030.

DATE	FROM	TO	PARTICULAR	HRS	RATE	AMOUNT
10/15/21	9:00	2:00	Evidentiary Hearing October 15, 2021	5.0	\$65.00	\$325.00
10/18/21	2:34	3:05	Evidentiary Hearing October 18, 2021	0.5	\$65.00	\$32.50
10/18/21	3:40	5:00	Evidentiary Hearing October 18, 2021	1.3	\$65.00	\$84.50
10/19/21	8:30	1:00	Evidentiary Hearing October 19, 2021	4.5	\$65.00	\$292.50
						\$734.50

Date 10/20/2021
Hua Yang

Signature: HY



**Bill To:**

Aaron Halegua, PLLC
 Attn: Aaron Halegua
 524 Broadway,
 11th Floor
 New York, NY 10012
 USA

Requested By:

Aaron Halegua
 Aaron Halegua, PLLC
 524 Broadway,
 11th Floor
 New York, NY 10012
 USA

Invoice #: 055483COMB**Invoice Date:** 06/30/2021**Invoice Due:** 07/30/2021**Sales Contact:** Kevin Feliciano
(kfeliciano@transperfect.com)**Payment Terms:** Net 30**Purchase Order #:**

Reference #: DM0206298 / 189734
Client Project ID: 18-cv-0030
Case Name: Tianming Wang v. Imperial Pacific International (CNMI), LLC
Matter #: 18-cv-0030
Requested Date: 05/27/2021
Project Notes: Tianming Wang v. Imperial Pacific International (CNMI), LLC
 June 2021 Digital Forensics

Description	Quantity	Unit	Unit Cost(US\$)	Extended Cost(US\$)
-				
Mobile Device Collection	1.00	Each	590.000	590.00
Acquisition of Apple iPhone Mobile Device				
Storage Drive Set - 1 TB	1.00	Each	230.000	230.00
Storage Media for Preserved Data				
U.S. & Foreign Forensic - Consulting	3.00	Hours	355.000	1,065.00
Composition of Summary & Narrative Reports				
Reference #: DM0206298 / 189734				US\$1,885.00

Purchase Order #:

Reference #: DM0210161 / 192591
Client Project ID: 18-cv-0030
Case Name: Tianming Wang v. Imperial Pacific International (CNMI), LLC
Matter #: 18-cv-0030
 07/12/2021
Project Notes: Case: Tianming Wang v. Imperial Pacific International (CNMI), LLC
 July 2021 Digital Forensics

Description	Quantity	Unit	Unit Cost(US\$)	Extended Cost(US\$)
Digital Forensics				

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Affidavit Preparation
Affidavit Composition

3.00 Hours 355.000 1,065.00

Reference #: DM0210161 / 192591 US\$1,065.00

Purchase Order #:

Reference #: DM0212554 / 192808
Case Name: Tianming Wang v. Imperial Pacific International (CNMI), LLC
Matter #: 18-cv-0030
 08/25/2021
Project Notes: Case: Tianming Wang v. Imperial Pacific International (CNMI), LLC
 August 2021 Digital Forensics

Description	Quantity	Unit	Unit Cost(US\$)	Extended Cost(US\$)
-				
Forensic - Consulting Affidavit Review, Response Affidavit Composition, Testimony Preparation, & Hearing Attendance	5.50	Hours	355.000	1,952.50

Reference #: DM0212554 / 192808 US\$1,952.50

Total to Bill This Contract: US\$4,902.50

Tax Amount: US\$435.09

Total Amount Due: US\$5,337.59

Please note, TransPerfect always prefers to receive payments electronically whenever possible.

PAYMENT INSTRUCTIONS

Please remit payment to:

TransPerfect Document Management, Inc.
 Attn.: Accounts Receivable
 1250 Broadway, 32nd Floor
 New York, NY 10001
 212.689.5555
 ar@transperfect.com

Wire Transfer Details:

Signature NY
 A/C #: 1500646914
 ABA Routing #: 026013576
 SWIFT CODE: SIGNUS33

Please reference the Contract # DM0206298 and Invoice # 055483COMB with your remittance.

Interest will be charged at the rate of 1.5% per month (or the maximum allowed by law)
 for accounts more than 30 days past due.

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Appendix D

*Second TransPerfect Invoice
Highlighted by Ms. Cui's Counsel*

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Bill To:

Aaron Halegua, PLLC
 Attn: Aaron Halegua
 524 Broadway,
 11th Floor
 New York, NY 10012
 USA

Requested By:

Aaron Halegua
 Aaron Halegua, PLLC
 524 Broadway,
 11th Floor
 New York, NY 10012
 USA

Invoice #: 056660COMB

Invoice Date: 10/27/2021

Invoice Due: 11/26/2021

Sales Contact: Kevin Feliciano
(kfeliciano@transperfect.com)

Payment Terms: Net 30

Purchase Order #:

Reference #: DM0216771 / 196396
 Case Name: Tianming Wang v. Imperial Pacific International
 (CNMI), LLC
 Matter #: Tianming Wang
 Requested Date: 10/21/2021
 Project Notes: Case: Tianming Wang
 October 2021 Digital Forensics

Description	Quantity	Unit	Unit Cost(US\$)	Extended Cost(US\$)
-				
Forensic - Consulting	2.00	Hours	355.000	710.00
SIM Card Acquisition, iCloud Access Attempts, Declaration Composition				
Hourly - Off-Hours	2.50	Hours	445.000	1,112.50
Standby & Testimony				

Reference #: DM0216771 / 196396 US\$1,822.50

Purchase Order #:

Reference #: DM0214387 / 195339
 Case Name: Tianming Wang v. Imperial Pacific International
 (CNMI), LLC
 09/09/2021
 Project Notes: Case: Tianming Wang v. Imperial Pacific International (CNMI), LLC
 September 2021 Digital Forensics

Description	Quantity	Unit	Unit Cost(US\$)	Extended Cost(US\$)
-				
Forensic HD Collection-Lab	1.00	Each	590.000	590.00
Forensic Image Acquisition of HP Computer Hard Drive				
Storage Drive Set - 1 TB	1.00	Each	230.000	230.00

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Storage Media for Acquired Forensic Image				
Forensic - Analysis	9.00	Hours	355.000	3,195.00
Forensic Analysis of HP Computer Hard Drive Image				
Forensic - Consulting	5.00	Hours	355.000	1,775.00
Senior Forensic Consulting - Declaration Composition				

Reference #: DM0214387 / 195339 US\$5,790.00

Total to Bill This Contract:	US\$7,612.50
Tax Amount:	US\$675.60
Total Amount Due:	US\$8,288.10

PAYMENT INSTRUCTIONS	Please note, TransPerfect always prefers to receive payments electronically whenever possible.
<u>Please remit payment to:</u> TransPerfect Document Management, Inc. Attn.: Accounts Receivable 1250 Broadway, 32nd Floor New York, NY 10001 212.689.5555 ar@transperfect.com	<u>Wire Transfer Details:</u> Signature NY A/C #: 1500646914 ABA Routing #: 026013576 SWIFT CODE: SIGNUS33
Please reference the Contract # DM0216771 and Invoice # 056660COMB with your remittance. Interest will be charged at the rate of 1.5% per month (or the maximum allowed by law) for accounts more than 30 days past due.	

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